

**COLORADO DISCHARGE PERMIT SYSTEM (CDPS)
FACT SHEET FOR PERMIT NUMBER CO0024082
CITY OF DURANGO, CITY OF DURANGO WWTF
LA PLATA COUNTY**

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I. TYPE OF PERMIT

- A. Permit Type:** Domestic - Major Municipal, Mechanical Plant, Seventh Renewal
- B. Discharge To:** Surface Water

II. FACILITY INFORMATION

- A. SIC Code:** 4952 Sewerage Systems
- B. Facility Classification:** Class B per Section 100.5.2 of the Water and Wastewater Facility Operator Certification Requirements
- C. Facility Location:** Latitude: 37.262° N, Longitude: 107.88066° W; 105 South Camino Del Rio Durango, CO 81301
- D. Permitted Feature:** 001A, following disinfection and prior to mixing with the receiving stream. 37° 15' 45" N, 107° 52' 39.78 " W (original discharge point)
002A, following disinfection and prior to mixing with the receiving stream. 37° 15' 32 " N, 107° 52' 37" W (located about 1900 feet downstream from outfall 001A to enable the facility to discharge treated effluent to the Animas River downstream of the intake for the Animas-La Plata Project pumping station)
- The location(s) provided above will serve as the point(s) of compliance for this permit and are appropriate as they are located after all treatment and prior to discharge to the receiving water.
- E. Facility Flows:** 3 MGD

F. Major Changes From Last Renewal:

Temperature monitoring requirements have been added. Ammonia calculations were made using AMMTOX model.

III. RECEIVING STREAM

A. Waterbody Identification: *COSJAF05A, the Animas River*

B. Water Quality Assessment:

An assessment of the stream standards, low flow data, and ambient stream data has been performed to determine the assimilative capacities for *the Animas River* for potential pollutants of concern. This information, which is contained in the Water Quality Assessment (WQA) for this receiving stream(s), also includes an antidegradation review, where appropriate. The Division's Permits Section has reviewed the assimilative capacities to determine the appropriate water quality-based effluent limitations as well as potential limits based on the antidegradation evaluation, where applicable. The limitations based on the assessment and other evaluations conducted as part of this fact sheet can be found in Part I.A of the permit.

Permitted Features *001A and 002A* will continue to be the authorized discharge point to the receiving stream.

IV. FACILITY DESCRIPTION

A. Infiltration/Inflow (I/I)

The City of Durango collection system serves a significant temporary day population in tourism and with that daytime rise in population the facility sees increased flows outside of the normal per capita contribution of 120 gallons per day. In the previous fact sheet the facility exceeded the 120 gallons per capita threshold. However, calculations indicate that the maximum of the monthly average flows of 2.1 MGD divided by the 18,500 persons service population results in 113 gpcpd. This indicates that the collection system maintenance in place is helping with the threshold going from 120 gpcpd (in previous fact sheet) to 113 gpcpd and therefore, no additional conditions will be implemented at this time.

B. Lift Stations

Table IV-1 summarizes the information provided in the renewal application for the lift stations in the service area.

Table IV-1 – Lift Station Summary

Station Name/#	Firm Pump Capacity (gpm)	Average Flows (gpd), from previous fact sheet	% Capacity (based on average flow)
Upper Animas (WASD #2)	2 pumps @ 160 each	18720	4%
Lower Animas (WASD #1)	2 pumps @ 160 each	38496	8.3%
Upper Ramada	2 pumps @ 250 each	20850	2.8%
Lower Ramada	2 pumps @ 250 each	86700	12%
Island Cove	3 pumps @ 150 each	105480	16%
Fish Hatchery	2 pumps @ 168 each	2117	1%
VFW	2 pumps @ 100 each	6600	2.2%
Westside	2 pumps @ 160 each	44400	9.6%
Double Tree (Red Lion)	2 pumps @ 400 each	46560	4%
Lightner Creek	2 pumps @ 100 each	72200	25%
BODO #1	2 pumps @ 1000 each	100800	4%
BODO #2	2 pumps @ 950 each	85500	3%
BODO East	2 pumps @ 350 each	13860	1.3%
Rivergate	2 pumps @ 206 each	15200	2.5%
BODO #3	2 pumps @ 400 each	60240	5.2%
BODO #4	2 pumps @ 125 each	11700	3.2%
BODO #5	2 pumps @ 180 each	3780	1%

C. Chemical Usage

The permittee stated in the application that they utilize four chemicals in their treatment process. The MSDS sheets have been reviewed and the following chemicals have been approved for use and are summarized in the following table.

Table IV-2 – Chemical Additives

Chemical Name	Purpose	Constituents of Concern
Calcium Hypochloride	chlorination	Chloride
Sodium Bisulfide	de-chlorination	-
Polydyne C-6286	thickening	-
Polydyne CE373	settling	-

Chemicals deemed acceptable for use in waters that will or may be discharged to waters of the State are acceptable only when used in accordance with all state and federal regulations, and in strict accordance with the manufacturer's site-specific instructions.

D. Treatment Facility, Facility Modifications and Capacities

The facility consists of a headworks with a mechanical bar screen, a Parshall flume and influent flow recorder and two aerated grit chambers. Following the headworks, flow enters two primary clarifiers, followed by four aeration basins with subsurface aeration, followed by two secondary clarifiers, and finally an ultraviolet (UV) disinfection system.

The permittee has not performed any construction at this facility that would change the hydraulic capacity of 3 MGD or the organic capacity of 6000 lbs BOD₅/day, which were specified in Site Approval 3592. That document should be referred to for any additional information.

Pursuant to Section 100.5.2 of the Water and Wastewater Facility Operator Certification Requirements, this facility will require a Class B certified operator.

E. Biosolids Treatment and Disposal

Raw sewage sludge from primary clarifiers is pumped directly to an anaerobic digester. Waste activated sludge and scum from the secondary clarifiers is pumped to a holding tank equipped with aeration to maintain solids in suspension. The waste sludge is then fed to a rotary drum thickener, mixed with polymer and dewatered. Thickened sludge then sent to digester to produce class B biosolids which is then hauled by a contractor.

1. EPA General Permit

EPA Region 8 issued a General Permit (effective October 19, 2007) for Colorado facilities whose operations generate, treat, and/or use/dispose of sewage sludge by means of land application, landfill, and surface disposal under the National Pollutant Discharge Elimination System. All Colorado facilities are required to apply for and to obtain coverage under the EPA General Permit.

2. Biosolids Regulation (Regulation No. 64, Colorado Water Quality Control Commission)

While the EPA is now the issuing agency for biosolids permits, Colorado facilities that land apply biosolids must comply with requirements of Regulation No. 64, such as the submission of annual reports as discussed later in this rationale.

V. PERFORMANCE HISTORY

A. Monitoring Data

1. Discharge Monitoring Reports – The following tables summarize the effluent data reported on the Discharge Monitoring Reports (DMRs) for the previous permit term, from October 31, 2007 through October 31, 2012.

Table V-1 – Summary of DMR Data for Permitted Feature 001A/002A

<i>Parameter</i>	<i># Samples or Reporting Periods</i>	<i>Reported Average Concentrations Avg/Min/Max</i>	<i>Reported Maximum Concentrations Avg/Min/Max</i>	<i>AD 2-Year Average Avg/Min/Max</i>	<i>Previous Avg/Max/AD Permit Limit</i>	<i>Number of Limit Excursi ons</i>
<i>Influent Flow (MGD)</i>	60	2/1.8/2.2	2.1/1.9/2.5		Report/Report	
<i>Effluent Flow (MGD)</i>	60	1.9/1.7/2.1	2.1/1.9/2.6		3/NA	
<i>pH (su)</i>	60	6.9/6.6/7.2	7.2/6.9/7.5		NA - 6.5-9.0	
<i>Fecal Coliform (#/100 ml)</i>	60	70/3/1241	157/6/10981	137/104/176	5518/11036/1316	
<i>TRC (mg/l)</i>	4	0/0/0	0.016/0/0.06	NA/NA/NA	NA/0.09	
<i>NH3 as N, Tot (mg/l)</i>	60	5.2/0.63/19	11/1.3/51	NA/NA/NA	NA/NA	
<i>NH3 as N, Tot (mg/l) Jan</i>	5	7.5/3.8/11	12/7/18	NA/NA/NA	31/NA	
<i>NH3 as N, Tot (mg/l) Feb</i>	5	11/4.6/19	21/6.8/44	NA/NA/NA	32/NA	
<i>NH3 as N, Tot (mg/l) Mar</i>	5	7.4/3.8/12	20/6.8/51	NA/NA/NA	34/NA	
<i>NH3 as N, Tot (mg/l) Apr</i>	5	3.3/2.1/4.2	7.3/4.7/11	NA/NA/NA	34/NA	
<i>NH3 as N, Tot (mg/l) May</i>	5	3.1/0.63/6.6	6.1/2.2/11	NA/NA/NA	22/NA	
<i>NH3 as N, Tot (mg/l) Jun</i>	5	3.7/1.5/8.7	9.2/3.7/19	NA/NA/NA	29/NA	
<i>NH3 as N, Tot (mg/l) Jul</i>	5	2.9/0.83/5.6	8/3.1/17	NA/NA/NA	28/NA	
<i>NH3 as N, Tot (mg/l) Aug</i>	5	2.2/0.75/3.6	6.3/1.3/12	NA/NA/NA	22/NA	
<i>NH3 as N, Tot (mg/l) Sep</i>	5	5.3/2.6/11	16/4.5/40	NA/NA/NA	23/NA	
<i>NH3 as N, Tot (mg/l) Oct</i>	5	6.8/4.4/13	15/6.6/40	NA/NA/NA	21/NA	
<i>NH3 as N, Tot (mg/l) Nov</i>	5	4.7/1.5/8.5	10/3.4/19	NA/NA/NA	31/NA	
<i>NH3 as N, Tot (mg/l) Dec</i>	5	4.8/2.2/7.4	7.3/3.2/13	NA/NA/NA	28/NA	
<i>CBOD5, influent (mg/l)</i>	60	263/186/418	285/210/438		NA/NA/	
<i>CBOD5, influent (lbs/day)</i>	60	4315/3101/6861	4704/3471/7551		NA/NA/	
<i>CBOD5, effluent (mg/l)</i>	60	3.1/1.7/6.3	4.3/1.9/18		25/40/	
<i>CBOD5 (% removal)</i>	60	99/97/99	NA/NA/NA		85%/NA/	
<i>TSS, influent (mg/l)</i>	60	305/240/348	340/260/427		NA/NA/	
<i>TSS, effluent (mg/l)</i>	60	4.7/2/14	6.8/2.3/32		30/45/	
<i>TSS (% removal)</i>	60	97/98.75/99	NA/NA/NA		85%/NA/	
<i>Oil and Grease (mg/l)</i>	60	NA/NA/NA	0/0/0		NA/10/	
<i>TDS (mg/l)</i>		//	//		Report/Report/	
<i>PWS intake (mg/l)</i>	60	130/62/200	130/62/200	NA/NA/NA	NA/NA/	
<i>WWTF effluent (mg/l)</i>	60	412/312/572	412/312/572	NA/NA/NA	NA/NA/	

Table V-1 – Summary of DMR Data for Permitted Feature 001A/002A, continued

<i>Parameter</i>	<i># Samples or Reporting Periods</i>	<i>Reported Average Concentrations Avg/Min/Max</i>	<i>Reported Maximum Concentrations Avg/Min/Max</i>	<i>AD 2-Year Average Avg/Min/Max</i>	<i>Previous Avg/Max/AD Permit Limit</i>	<i>Number of Limit Excursions</i>
<i>Al, Dis (µg/l)</i>	59	17/<100/120	30/<100/120	NA/NA/NA	Report/Report	<i>Reporting issue with 2-year rolling average</i>
<i>As, TR (µg/l)</i>	5	0.24/<100/1.2	0.24/<100/1.2	NA/NA/NA	NA/NA	
<i>Cd, TR (µg/l)</i>	5	0/<0.06/0	0/<0.06/0	NA/NA/NA	NA/NA	
<i>Cr, TR (µg/l)</i>	5	2.4/<10/10	2.4/<10/10	NA/NA/NA	NA/NA	
<i>Cr+3, TR (µg/l)</i>	59	0.47/<8/10	0.71/<8/10	NA/NA/NA	Report/Report	
<i>Cu, TR (µg/l)</i>	5	27/<20/100	27/<20/100	NA/NA/NA	NA/NA	
<i>CN, Tot (µg/l)</i>	5	0/<5/0	0/<5/0	NA/NA/NA	NA/NA	
<i>CN, Free (µg/l)</i>	60	0.43/<5/20	0.43/<5/20	NA/NA/NA	Report/60	
<i>Fe, TR (µg/l)</i>	28	125/0/293	135/0/293	NA/NA/NA	Report/Report	
<i>Pb, TR (µg/l)</i>	5	0.13/<50/0.67	0.13/<50/0.67	NA/NA/NA	NA/NA	
<i>Mn, Dis (µg/l)</i>	59	35/13/59	38/15/57	NA/NA/NA	Report/Report	
<i>Mo, TR (µg/l)</i>	5	4.1/<10/19	4.1/<10/19	NA/NA/NA	NA/NA	
<i>Hg, Tot (µg/l)</i>	5	0/<0.2/0	0/<0.2/0	NA/NA/NA	NA/NA	
<i>Ni, TR (µg/l)</i>	5	6.6/<20/31	6.6/<20/31	NA/NA/NA	NA/NA	
<i>Se, TR (µg/l)</i>	5	0.36/<200/1.8	0.36/<200/1.8	NA/NA/NA	NA/NA	
<i>Ag, TR (µg/l)</i>	5	0.006/<10/0.03	0.006/<10/0.03	NA/NA/NA	NA/NA	
<i>Ag, Dis (µg/l)</i>	60	0.86/<10/1.2	0.86/<10/1.2	-	Report/Report/2	
<i>Zn, TR (µg/l)</i>	5	49/<50/80	49/<50/80	NA/NA/NA	NA/NA	
<i>Wet, acute</i>						
<i>pimephales, LC50</i>	14	//	100/100/100	//		
<i>ceriodaphnia LC50</i>	14	//	100/100/100	//		

B. Compliance With Terms and Conditions of Previous Permit

1. Effluent Limitations – The data shown in the preceding table(s) indicates compliance with the numeric limitations of the previous permit. The Division noticed that the 2-year rolling average had potentially been miscalculated. The issue was communicated to the facility and the compliance unit of the Division to work together to resolve the issue.

In accordance with 40 CFR Part 122.41(a), any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

VI. DISCUSSION OF EFFLUENT LIMITATIONS

A. Regulatory Basis for Limitations

1. Technology Based Limitations
 - a. Federal Effluent Limitation Guidelines – The Federal Effluent Limitation Guidelines for domestic wastewater treatment facilities are the secondary treatment standards. These standards

have been adopted into, and are applied out of, Regulation 62, the Regulations for Effluent Limitations.

- b. Regulation 62: Regulations for Effluent Limitations – These Regulations include effluent limitations that apply to all discharges of wastewater to State waters and are shown in Section VIII of the WQA. These regulations are applicable to the discharge from the City of Durango WWTF.
2. Numeric Water Quality Standards - The WQA contains the evaluation of pollutants limited by water quality standards. The mass balance equation shown in Section VI of the WQA was used for most pollutants to calculate the potential water quality based effluent limitations (WQBELs), M_2 , that could be discharged without causing the water quality standard to be violated. For ammonia, the AMMTOX Model was used to determine the maximum assimilative capacity of the receiving stream. A detailed discussion of the calculations for the maximum allowable concentrations for the relevant parameters of concern is provided in Section V of the Water Quality Assessment developed for this permitting action.

The maximum allowable effluent pollutant concentrations determined as part of these calculations represent the calculated effluent limits that would be protective of water quality. These are also known as the water quality-based effluent limits (WQBELs). Both acute and chronic WQBELs may be calculated based on acute and chronic standards, and these may be applied as daily maximum (acute) or 30-day average (chronic) limits.

3. Narrative Water Quality Standards - Section 31.11(1)(a)(iv) of The Basic Standards and Methodologies for Surface Waters (Regulation No. 31) includes the narrative standard that State surface waters shall be free of substances that are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life.
 - a. Whole Effluent Toxicity - The Water Quality Control Division has established the use of WET testing as a method for identifying and controlling toxic discharges from wastewater treatment facilities. WET testing is being utilized as a means to ensure that there are no discharges of pollutants "in amounts, concentrations or combinations which are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life" as required by Section 31.11 (1) of the Basic Standards and Methodologies for Surface Waters. The requirements for WET testing are being implemented in accordance with Division policy, Implementation of the Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (Sept 30, 2010). Note that this policy has recently been updated and the permittee should refer to this document for additional information regarding WET.
4. Water Quality Regulations, Policies, and Guidance Documents
 - a. Antidegradation - Since the receiving water is Undesignated, an antidegradation review is required pursuant to Section 31.8 of The Basic Standards and Methodologies for Surface Water. As set forth in Section VII of the WQA, an antidegradation evaluation was conducted for pollutants when water quality impacts occurred and when the impacts were significant. Based on the antidegradation requirements and the reasonable potential analysis discussed above, antidegradation-based average concentrations (ADBACs) may be applied.

According to Division procedures, the facility has three options related to antidegradation-based

effluent limits: (1) the facility may accept ADBACs as permit limits (see Section VII of the WQA); (2) the facility may select permit limits based on their non-impact limit (NIL), which would result in the facility not being subject to an antidegradation review and thus the antidegradation-based average concentrations would not apply (the NILs are also contained in Section VII of the WQA); or (3) the facility may complete an alternatives analysis as set forth in Section 31.8(3)(d) of the regulations which would result in alternative antidegradation-based effluent limitations.

The effluent must not cause or contribute to an exceedance of a water quality standard and therefore the WQBEL must be selected if it is lower than the NIL. Where the WQBEL is not the most restrictive, the discharger may choose between the NIL or the ADBAC: the NIL results in no increased water quality impact; the ADBAC results in an “insignificant” increase in water quality impact. The ADBAC limits are imposed as two-year average limits.

- b. Antibacksliding – As the receiving water is designated Reviewable or Outstanding, and the Division has performed an antidegradation evaluation, in accordance with the Antidegradation Guidance, the antibacksliding requirements in Regulation 61.10 have been met.
- c. Determination of Total Maximum Daily Loads (TMDLs) –The receiving stream to which the City of Durango WWTF discharges is currently listed on the State’s 303(d) list for development of TMDLs for Mn(Ws). However, the TMDL has not yet been finalized. Although this permit establishes limits for these pollutants, they do not represent the TMDLs and waste load allocations, and are therefore subject to change upon finalization of an approved TMDL for this segment.
- d. Colorado Mixing Zone Regulations – Pursuant to section 31.10 of The Basic Standards and Methodologies for Surface Water, a mixing zone determination is required for this permitting action. The Colorado Mixing Zone Implementation Guidance, dated April 2002, identifies the process for determining the meaningful limit on the area impacted by a discharge to surface water where standards may be exceeded (i.e., regulatory mixing zone). This guidance document provides for certain exclusions from further analysis under the regulation, based on site-specific conditions.

The guidance document provides a mandatory, stepwise decision-making process for determining if the permit limits will not be affected by this regulation. Exclusion, based on Extreme Mixing Ratios, may be granted if the ratio of the facility design flow to the chronic low flow (30E3) is greater than 2:1. Since the ratio of the design flow to the chronic low flow is 1:32, the permittee must perform additional studies to determine if further requirements apply.

The remaining threshold tests require site-specific information that is currently not available and thus a determination cannot be made about how the regulation may affect the setting of effluent limits in this permit. Therefore, a compliance schedule is necessary for acquisition of this information, which will be used to complete the testing of exclusion thresholds before the next permit renewal.

- e. Salinity Regulations – In compliance with the Colorado River Salinity Standards and the Colorado Discharge Permit System Regulations, the permittee shall monitor for total dissolved solids on a **Monthly** basis. Samples shall be taken at Permitted Feature 001A and 002A.

Based on an annual average of the past sampling data submitted, this permittee does not exceed the average annual incremental increase of 400 mg/l or less. Therefore, no special reports are required and **Monthly** monitoring by composite sample, as required by the regulation, will continue.

- g. Reasonable Potential Analysis – Using the assimilative capacities contained in the WQA, an analysis must be performed to determine whether to include the calculated assimilative capacities as WQBELs in the permit. This reasonable potential (RP) analysis is based on the Determination of the Requirement to Include Water Quality Standards-Based Limits in CDPS Permits Based on Reasonable Potential, dated December, 2002. This guidance document utilizes both quantitative and qualitative approaches to establish RP depending on the amount of available data.

A qualitative determination of RP may be made where ancillary and/or additional treatment technologies are employed to reduce the concentrations of certain pollutants. Because it may be anticipated that the limits for a parameter could not be met without treatment, and the treatment is not coincidental to the movement of water through the facility, limits may be included to assure that treatment is maintained.

A qualitative RP determination may also be made where a federal ELG exists for a parameter, and where the results of a quantitative analysis results in no RP. As the federal ELG is typically less stringent than a limitation based on the WQBELs, if the discharge was to contain concentrations at the ELG (above the WQBEL), the discharge may cause or contribute to an exceedance of a water quality standard.

To conduct a quantitative RP analysis, a minimum of 10 effluent data points from the previous 5 years, should be used. The equations set out in the guidance for normal and lognormal distribution, where applicable, are used to calculate the maximum estimated pollutant concentration (MEPC). For data sets with non-detect values, and where at least 30% of the data set was greater than the detection level, MDLWIN software is used consistent with Division guidance to generate the mean and standard deviation, which are then used to establish the multipliers used to calculate the MEPC. If the MDLWIN program cannot be used the Division's guidance prescribes the use of best professional judgment.

For some parameters, recent effluent data or an appropriate number of data points may not be available, or collected data may be in the wrong form (dissolved vs total) and therefore may not be available for use in conducting an RP analysis. Thus, consistent with Division procedures, monitoring will be required to collect samples to support a RP analysis and subsequent decisions for a numeric limit. A compliance schedule may be added to the permit to require the request of an RP analysis once the appropriate data have been collected.

For other parameters, effluent data may be available to conduct a quantitative analysis, and therefore an RP analysis will be conducted to determine if there is RP for the effluent discharge to cause or contribute to exceedances of ambient water quality standards. The guidance specifies that if the MEPC exceeds the maximum allowable pollutant concentration (MAPC), limits must be established and where the MEPC is greater than half the MAPC (but less than the MAPC), monitoring must be established. Table VI-1 contains the calculated MEPC compared to the corresponding MAPC, and the results of the reasonable potential evaluation, for those parameters that met the data requirements. The RP determination is discussed for each parameter in the text below.

Table VI-1 – Reasonable Potential Analysis

<i>Pollutant</i>	<i>Maximum of 30-Day Avg Effluent Conc. Or MEPC</i>	<i>30-Day Avg Proposed WQBEL</i>	<i>30-Day Avg RP</i>	<i>Maximum of Daily Max or 7-Day Avg Effluent Conc. Or MEPC</i>	<i>Daily Max or 7-Day Avg Proposed WQBEL</i>	<i>Daily Max RP</i>	<i>Maximum of 2-Yr Avg Effluent Conc. Or MEPC</i>	<i>Proposed ADBACs</i>	<i>2-Year Avg RP</i>
Temp Daily Max (°C) April-Oct				NA	23.9	Monitor			
Temp Daily Max (°C) Nov-March				NA	13	Monitor			
Temp MWAT (°C) April-Oct	NA	18.3	Monitor						
Temp MWAT (°C) Nov-March	NA	9	Monitor						
E. coli (#/100 ml)	NA	2000	Yes (Qual)	NA	4000	Yes (Qual)	NA	NA	NA
TRC (mg/l)	0	0.36	Yes (Qual)	0.06	0.5	Yes (Qual)	NA	0.11	Yes (Qual)
Nitrate as N (mg/l)	NA	NA	NA	NA	282	No (Qual)	NA	42	No (Qual)
NH3 as N, Tot (mg/l) Jan	10.94	100	Yes (Qual)	17.7	125	Yes (Qual)	10.94	15.5	Yes (Qual)
NH3 as N, Tot (mg/l) Feb	19.03	19	Yes (Qual)	43.9	100	Yes (Qual)	19.03	NA	NA
NH3 as N, Tot (mg/l) Mar	12.27	12	Yes (Qual)	51.4	96	Yes (Qual)	9.89	NA	NA
NH3 as N, Tot (mg/l) Apr	4.19	105	Yes (Qual)	10.6	190	Yes (Qual)	3.88	15.3	Yes (Qual)
NH3 as N, Tot (mg/l) May	6.63	460	Yes (Qual)	11.3	270	Yes (Qual)	6.63	36	Yes (Qual)
NH3 as N, Tot (mg/l) Jun	8.71	260	Yes (Qual)	18.9	260	Yes (Qual)	5.115	39	Yes (Qual)
NH3 as N, Tot (mg/l) Jul	5.57	12	Yes (Qual)	16.8	190	Yes (Qual)	5.57	NA	NA
NH3 as N, Tot (mg/l) Aug	3.63	110	Yes (Qual)	11.6	130	Yes (Qual)	3.63	17	Yes (Qual)
NH3 as N, Tot (mg/l) Sep	11.05	11	Yes (Qual)	39.6	100	Yes (Qual)	5.334	NA	NA
NH3 as N, Tot (mg/l) Oct	12.75	13	Yes (Qual)	40.3	90	Yes (Qual)	7.1425	NA	NA
NH3 as N, Tot (mg/l) Nov	8.5	70	Yes (Qual)	18.8	70	Yes (Qual)	6.125	11.5	Yes (Qual)
NH3 as N, Tot (mg/l) Dec	7.42	8.59	Yes (Qual)	13.1	100	Yes (Qual)	6.49	NA	NA
Al, TR (µg/l)	120*	47079	No (Qual)	120*	283739	No (Qual)	120*	7072	No (Qual)
As, TR (µg/l)	1.2	0.65	Yes (Qual)	NA	NA	NA	NA	NA	NA
As, Dis (µg/l)	NA	NA	NA	1.2**	9579	No (Qual)	1.2**	1437	No (Qual)
Cd, Dis (µg/l)	0***	15	No (Qual)	0***	90	No (Qual)	0***	0.3	No (Qual)
Cr, TR (µg/l)	10	1409	No (Qual)	10	1409	No (Qual)	10	211	No (Qual)
Cr+3, TR (µg/l)	16	1409	No	23	1409	No	1.36	310	No
Cr+3, Dis (µg/l)	16#	4714	No (Qual)	NA	NA	NA	16#	720	No (Qual)
Cr+6, Dis (µg/l)	16#	360	No (Qual)	16#	451	No (Qual)	16#	56	No (Qual)
Cu, Dis (µg/l)	20##	478	No (Qual)	20##	722	No (Qual)	20##	121	No (Qual)
CN, Free (µg/l)				37	141	No	1.83	37	No
Fe, Dis (µg/l)	293###	8997	No (Qual)				293###	648	No (Qual)
Fe, TR (µg/l)	357	25153	No				154	12909	No
Pb, Dis (µg/l)	0.67+	47	No (Qual)	0.67+	4211	No (Qual)	0.67+	0.9	Monitor
Mn, Dis (µg/l)	80	113.1	Monitor	84	105325	No	40	102	No
Mo, TR (µg/l)	19	5238	No (Qual)	NA	NA	NA	NA	786	No (Qual)
Hg, Tot (µg/l)	0	0.33	Monitor	NA	NA	NA	NA	0.049	Monitor
Ni, Dis (µg/l)	31++	3372	No (Qual)	31++	26202	No (Qual)	31++	491	No (Qual)
Se, Dis (µg/l)	1.8+++	151	No (Qual)	1.8+++	518	No (Qual)	1.8+++	23	No (Qual)
Ag, Dis (µg/l)	2	9.8	No	2	231	No	NA	NA	NA
Zn, Dis (µg/l)	80^	5580	No (Qual)	80^	5884	No (Qual)	80^	1357	No (Qual)
Chloride (mg/l)	NA	7677	No (Qual)	NA	NA	NA	NA	736	No (Qual)
Sulfate (mg/l)	NA	2948	No (Qual)	NA	NA	NA	NA	38	No (Qual)
Sulfide as H2S (mg/l)	NA	0.065	Monitor	NA	NA	NA	NA	0.0098	Monitor
Nonylphenol (µg/l)	NA	216	Monitor	NA	28	Monitor	NA	32	Monitor

*Max Dis Al; **TR As; ***Max recorded is <0.06 ug/l (0); # Max TR Cr; ## Max Dis Cu; ### Max TR Fe; + Max TR Pb; ++ Max TR Ni; +++ TR Ni; ^Max TR Zn

B. Parameter Evaluation

CBOD₅ - The CBOD₅ concentrations in Reg 62 are the most stringent effluent limits and are therefore applied. The removal percentages for CBOD₅ also apply based on the Regulations for Effluent Limitations. Note that CBOD₅ limits were imposed in lieu of the BOD₅ limits pursuant to the facility's request and in accordance with Section 62.5(6) of the regulations. These limitations are the same as those contained in the previous permit and are imposed upon the effective date of this permit.

Total Suspended Solids - The TSS concentrations in Reg 62 are the most stringent effluent limits and are therefore applied. The removal percentages for TSS also apply based on the Regulations for Effluent Limitations. These limitations are the same as those contained in the previous permit and are imposed upon the effective date of this permit.

Oil and Grease – The oil and grease limitations from the Regulations for Effluent Limitations are applied as they are the most stringent limitations. This limitation is the same as those contained in the previous permit and is imposed upon the effective date of this permit.

pH - This parameter is limited by the water quality standards of 6.5-9.0 s.u., as this range is more stringent than other applicable standards. This limitation is the same as that contained in the previous permit and is imposed upon the effective date of this permit.

E. Coli –The limitation for E. Coli is based upon the NIL as described in the WQA. A qualitative determination of RP has been made as the treatment facility has been designed to treat specifically for this parameter. Previous monitoring for fecal coliform (of which E. coli is a subset) as shown in Table V-1 indicates that this limitation can be met and is therefore imposed upon the effective date of the permit.

Total Residual Chlorine (TRC) - The limitation for TRC is based upon the WQBEL/ADBAC as described in the WQA. A qualitative determination of RP has been made as chlorine may be used in the treatment process. Previous monitoring as shown in Table V-1 indicates that this limitation can be met and is therefore imposed upon the effective date of the permit.

Total Inorganic Nitrogen (001A) - The calculated WQBEL/ADBAC for T.I.N. as set out in the WQA is imposed to protect downstream water supplies. Even though there is no data available regarding the presence or quantification of this parameter in the discharge, a qualitative no RP has been made since the potential limitations are significantly higher than normal domestic wastewater concentrations.

Ammonia - The limitation for ammonia is based upon the WQBEL/NIL/ADBAC as described in the WQA. A qualitative determination of RP has been made as the treatment facility has been designed to treat specifically for this parameter. Previous monitoring as shown in Table V-1 indicates that this limitation can be met and is therefore effective immediately.

Total Arsenic (001A) – A qualitative RP analysis was conducted as there was not enough data to conduct a quantitative RP analysis. Sample results for were as high as 1.2 ug/l, compared to the WQBEL of 0.65 ug/l. Therefore, a qualitative determination of RP has been made and limitations will be added and imposed upon the effective date of the permit. This is a new limitation and therefore a compliance schedule has been added to the permit to give the permittee time to meet this limitation.

Dissolved Arsenic – There is no data available regarding the presence or quantification of this parameter in the discharge. Therefore, TR Arsenic information is used for a qualitative RP. Since the maximum TR arsenic was 1.2 ug/l, as compared to a potential limitation of 9597 ug/l, a quantitative no RP has been made and no limitation will be needed for this parameter.

Potentially Dissolved Cadmium – A qualitative RP analysis was conducted as there was not enough data to conduct a quantitative RP analysis. Sample results for were non-detect at a detection level of 0.06 ug/l, compared to the WQBELs/ADBAC of 15/90/0.3 ug/l. Therefore, a qualitative no RP has been made and therefore, no limitations will be added to the permit.

Potentially Dissolved Trivalent Chromium – There is no data available regarding the presence or quantification of this parameter in the discharge. Therefore, TR chromium information is used for a qualitative RP. Since the maximum TR chromium was 16 ug/l, as compared to a potential limitation of 4714/720 ug/l (WQBEL/ADBAC), a quantitative no RP has been made and no limitation will be needed for this parameter.

Dissolved Hexavalent Chromium – There is no data available regarding the presence or quantification of this parameter in the discharge. Therefore, TR chromium information is used for a qualitative RP. Since the maximum TR chromium was 16 ug/l, as compared to a potential limitation of 360/56 ug/l (WQBEL/ADBAC), a quantitative no RP has been made and no limitation will be needed for this parameter.

Potentially Dissolved Copper – There is no data available regarding the presence or quantification of this parameter in the discharge. Therefore, dissolved copper information summarized in previous fact sheet is used for a qualitative RP. Since the maximum dissolved copper was 20 ug/l, as compared to a potential limitation of 478/722/121 ug/l (WQBELs/ADBAC), a quantitative no RP has been made for this parameter and therefore, no limitations will be added to the permit.

Cyanide – Based on the available data, a qualitative no RP has been made for this parameter (MEPC= 37 ug/l as compared to 141 ug/l of potential limitation) and no limitation will be added to the permit.

Dissolved Iron (001A)- There is no data available regarding the presence or quantification of this parameter in the discharge. Therefore, TR iron information is used for a qualitative RP. Since the maximum TR iron was 293 ug/l, as compared to a potential limitation of 8997/648 ug/l (WQBEL/ADBAC), a quantitative no RP has been made and no limitation will be needed for this parameter.

Total Recoverable Iron - The RP analysis for this parameter was based upon the WQBEL/ADBAC as calculated in the WQA. With the available data, MDLWIN program was used to determine the appropriate statistics to determine the MEPC. The MEPC was less than half of the MAPC and therefore limitations are not necessary at this time.

Dissolved Manganese (001A) - The RP analysis for this parameter was based upon the WQBEL/ADBAC as described in the WQA. With the available data: the normal program was used to determine the appropriate statistics to determine the MEPC. The MEPC was less than the MAPC and therefore limitations are not necessary at this time, however the MEPC was greater than 50% of the MAPC and therefore monitoring is required. Therefore, a report only requirement has been added to the permit, effective immediately.

Total Recoverable Molybdenum (001A) - There is no data available regarding the presence or quantification of this parameter in the discharge. Therefore, TR molybdenum information is used for a qualitative RP. Since the maximum TR molybdenum was 19 ug/l, as compared to a potential limitation of 5238/786 ug/l (WQBEL/ADBAC), a quantitative no RP has been made and no limitation will be needed for this parameter.

Potentially Dissolved Lead - There is no data available regarding the presence or quantification of this parameter in the discharge. Therefore, TR lead information is used for a qualitative RP. Since the maximum TR lead was 0.67 ug/l, as compared to a potential limitation of 47/0.9 ug/l (WQBELs/ADBAC), a quantitative RP has been made for monitoring for ADBAC and monitoring for ADBAC will be added to the permit for this parameter.

Total Mercury - Based on the available data, a qualitative monitor only RP has been made for this parameter (MEPC= 0 (non detect at 0.2 ug/l) as compared to 0.33/0.049 ug/l potential limitation) since the detection limit was higher than the ADBAC limitation. Therefore, monitoring at low levels will be added to the permit for 30-day average and ADBAC.

Potentially Dissolved Nickel- There is no data available regarding the presence or quantification of this parameter in the discharge. Therefore, TR nickel and dissolved nickel in previous fact sheet information are used for a qualitative RP. Since the maximum TR nickel was 31 ug/l, as compared to a potential limitation of 3372 / 491 ug/l (WQBEL/ADBAC), a quantitative no RP has been made and no limitation will be needed for this parameter.

Potentially Dissolved Selenium- There is no data available regarding the presence or quantification of this parameter in the discharge. Therefore, TR selenium and dissolved selenium information are used for a qualitative RP. Since the maximum TR selenium was 31 ug/l, as compared to a potential limitation of 151/23 ug/l (WQBEL/ADBAC), a quantitative no RP has been made and no limitation will be needed for this parameter.

Potentially Dissolved Silver – Based on the available data, a qualitative no RP has been made for this parameter (MEPC= 2 ug/l as compared to 9.8/231 ug/l of potential limitations) and no limitation will be added to the permit.

Potentially Dissolved Zinc - There is no data available regarding the presence or quantification of this parameter in the discharge. Therefore, TR zinc information is used for a qualitative RP. Since the maximum TR zinc was 80 ug/l, as compared to a potential limitation of 5580/1357 ug/l (WQBEL/ADBAC), a quantitative no RP has been made and no limitation will be needed for this parameter.

Chloride and Sulfate (001A only) - The calculated WQBEL for these parameters as set out in the WQA is imposed to protect downstream water supplies. A qualitative determination of no RP has been made as the potential limitations are significantly higher than that for a normal domestic WWTF discharge. Therefore, no limitations will be added to the permit.

Sulfide (001A only) - There is no data available regarding the presence/absence or quantification of this parameter in the discharge. Since the potential exists for this parameter to be present, monitoring has been added to the permit.

Temperature- Based on the information presented in the WQA, this facility is exempt from the

temperature requirements based on flow ratio's.

Organics –The effluent is not expected or known to contain organic chemicals, and therefore, limitations for organic chemicals are not needed in this permit.

Whole Effluent Toxicity (WET) Testing – This is a major domestic facility and it is expected that the effluent will have some concentration of both metals and ammonia. Although no RP exists for some metals, the combination of these parameters and their interactions could be harmful to the aquatic life and therefore, a WET testing will be required.

1. In-Stream Waste Concentration (IWC) – Where monitoring or limitations for WET are deemed appropriate by the Division, the chronic in-stream dilution is critical in determining whether acute or chronic conditions shall apply. In accordance with Division policy, for those discharges where the chronic IWC is greater than 9.1% and the receiving stream has a Class 1 Aquatic Life use or Class 2 Aquatic Life use with all of the appropriate aquatic life numeric standards, chronic conditions will normally apply. Where the chronic IWC is less than or equal to 9.1, or the stream is not classified as described above, acute conditions will normally apply. The chronic IWC is determined using the following equation:

$$\text{IWC} = [\text{Facility Flow (FF)} / (\text{Stream Chronic Low Flow (annual)} + \text{FF})] \times 100\%$$

The flows and corresponding IWC for the appropriate discharge point are:

Permitted Feature	Chronic Low Flow, 30E3 (cfs)	Facility Design Flow (cfs)	IWC, (%)
001A/002A	146	4.6	3

The IWC for this permit is 3%, which represents a wastewater concentration of 3% effluent to stream 97% receiving stream. Therefore, acute WET testing will be applied.

2. General Information – The permittee should read the WET testing section of Part I of the permit carefully, as this information has been updated in accordance with the Division's updated policy, Implementation of the Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (Sept 30, 2010) . The permit outlines the test requirements and the required follow-up actions the permittee must take to resolve a toxicity incident. The permittee should also read the above mentioned policy which is available on the Permit Section website. The permittee should be aware that some of the conditions outlined above may be subject to change if the facility experiences a change in discharge, as outlined in Part II.A.2. of the permit. Such changes shall be reported to the Division immediately.

C. Parameter Speciation

Total / Total Recoverable Arsenic

For total recoverable arsenic, the analysis may be performed using a graphite furnace, however, this method may produce erroneous results and may not be available to the permittee. Therefore, the total method of analysis will be specified instead of the total recoverable method.

Total Mercury

Until recently there has not been an effective method for monitoring low-level total mercury concentrations in either the receiving stream or the facility effluent. Monitoring for total mercury has been accomplished as part of past permit conditions and analytical results have all been found at less than detectable levels. However, detection levels only as low as 0.2 ug/l have been achieved, versus a total mercury limit of 0.04 ug/l.

To ensure that adequate data are gathered to determine reasonable potential and consistent with Division initiatives for mercury, quarterly effluent monitoring for total mercury at low-level detection methods will be required by the permit.

Dissolved Metals / Potentially Dissolved

For metals with aquatic life-based dissolved standards, effluent limits and monitoring requirements are typically based upon the potentially dissolved method of analysis, as required under Regulation 31, Basic Standards and Methodologies for Surface Water. Thus, effluent limits and/or monitoring requirements for these metals will be prescribed as the “potentially dissolved” form.

Dissolved Manganese if WS based

The dissolved iron and chronic manganese standards are drinking water-based standards. Thus, sample measurements for these two parameters must reflect the dissolved fraction of the metals.

VII. ADDITIONAL TERMS AND CONDITIONS

A. Monitoring

Effluent Monitoring – Effluent monitoring will be required as shown in the permit document. Refer to the permit for locations of monitoring points. Monitoring requirements have been established in accordance with the frequencies and sample types set forth in the Baseline Monitoring Frequency, Sample Type, and Reduced Monitoring Frequency Policy for Industrial and Domestic Wastewater Treatment Facilities. This policy includes the methods for reduced monitoring frequencies based upon facility compliance as well as for considerations given in exchange for instream monitoring programs initiated by the permittee. Table VII-1 shows the results of the reduced monitoring frequency analysis for Permitted Feature 001A/002A, based upon compliance with the previous permit.

Table VII-1 – Monitoring Reduction Evaluation

<i>Parameter</i>	<i>Proposed Permit Limit</i>	<i>Average of 30-Day (or Daily Max) Average Conc.</i>	<i>Standard Deviation</i>	<i>Long Term Characterization (LTC)</i>	<i>Reduction Potential</i>
<i>Fecal Coliform (#/100 ml)</i>	6000	96	322	740	3 Levels
<i>TRC (mg/l)</i>	0.36	0	0	0	3 Levels
<i>NH₃ as N, Tot (mg/l)</i>	70	4	2.3	8.6	3 Levels
<i>CBOD₅, effluent (mg/l)</i>	25	3.4	1.2	5.8	3 Levels
<i>TSS, effluent (mg/l)</i>	30	5.2	2.8	10.8	3 Levels
<i>Oil and Grease (mg/l)</i>	10	0	0	0	3 Levels
<i>As, TR (µg/l)</i>	0.65	0.24	0.54	1.32	None
<i>Mn, Dis (µg/l)</i>	113.1	35	13	61	2 Levels
<i>Hg, Tot (µg/l)</i>	0.33	0	0	0	3 Levels

B. Reporting

1. Discharge Monitoring Report – The City of Durango facility must submit Discharge Monitoring Reports (DMRs) on a monthly basis to the Division. These reports should contain the required summarization of the test results for all parameters and monitoring frequencies shown in Part I.B of the permit. See the permit, Part I.B, C, D and/or E for details on such submission.
2. Special Reports – Special reports are required in the event of an upset, bypass, or other noncompliance. Please refer to Part II.A. of the permit for reporting requirements. As above, submittal of these reports to the US Environmental Protection Agency Region VIII is no longer required.

C. Signatory and Certification Requirements

Signatory and certification requirements for reports and submittals are discussed in Part I.E.6. of the permit.

D. Compliance Schedules

The following compliance schedules are included in the permit. See Part I.B of the permit for more information.

Compliance schedules for metals, a mixing zone study and installation of temperature monitoring equipment have been added to the permit.

All information and written reports required by the following compliance schedules should be directed to the Permits Section for final review unless otherwise stated.

E. Stormwater

Stormwater Evaluation: Pursuant to 5 CCR 1002-61.3(2), wastewater treatment facilities with a design flow of 1.0 MGD or more, or that are required to have an approved pretreatment program, are specifically required to obtain stormwater discharge permit coverage, or a Stormwater No Exposure Certification, in order to discharge stormwater from their facilities to state waters. The stormwater discharge permit applicable to wastewater treatment facilities is the CDPS General Permit for Stormwater Discharges Associated with Non-Extractive Industrial Activity.

Division records indicate that the City of Durango applied for and obtained coverage under the CDPS General Permit for Stormwater Discharges Associated with Non-Extractive Industrial Activity for the Durango WWTF facility. The CDPS certification number is COR900100.

F. Economic Reasonableness Evaluation

Section 25-8-503(8) of the revised (June 1985) Colorado Water Quality Control Act required the Division to "determine whether or not any or all of the water quality standard based effluent limitations are reasonably related to the economic, environmental, public health and energy impacts to the public and affected persons, and are in furtherance of the policies set forth in sections 25-8-192 and 25-8-104."

The Colorado Discharge Permit System Regulations, Regulation No. 61, further define this requirement under 61.11 and state: "Where economic, environmental, public health and energy impacts to the public and affected persons have been considered in the classifications and standards setting process, permits written to meet the standards may be presumed to have taken into consideration economic factors unless:

- a. A new permit is issued where the discharge was not in existence at the time of the classification and standards rulemaking, or
- b. In the case of a continuing discharge, additional information or factors have emerged that were not anticipated or considered at the time of the classification and standards rulemaking."

The evaluation for this permit shows that the Water Quality Control Commission, during their proceedings to adopt the Classifications and Numeric Standards for San Juan River and Dolores River Basins, considered economic reasonableness.

Furthermore, this is not a new discharger and no new information has been presented regarding the classifications and standards. Therefore, the water quality standard-based effluent limitations of this permit are determined to be reasonably related to the economic, environmental, public health and energy impacts to the public and affected persons and are in furtherance of the policies set forth in Sections 25-8-102 and 104. If the permittee disagrees with this finding, pursuant to 61.11(b)(ii) of the Colorado Discharge Permit System Regulations, the permittee should submit all pertinent information to the Division during the public notice period.

Kenan Diker
October 29, 2012

VIII. REFERENCES

- A. Colorado Department of Public Health and Environment, Water Quality Control Division Files, for Permit Number CO0024082.
- B. "Design Criteria Considered in the Review of Wastewater Treatment Facilities", Policy 96-1, Colorado Department of Public Health and Environment, Water Quality Control Commission, April 2007.
- C. Basic Standards and Methodologies for Surface Water, Regulation No. 31, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective January 1, 2012.
- D. Classifications and Numeric Standards for San Juan River and Dolores River Basins, Regulation No. 34, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective Upcoming.
- E. Colorado Discharge Permit System Regulations, Regulation No. 61, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective January 30, 2012.
- F. Regulations for Effluent Limitations, Regulation No. 62, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective July 30, 2012.
- G. Pretreatment Regulations, Regulation No. 63, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective April 01, 2007.

- H. Biosolids Regulation, Regulation No. 64, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective March 30, 2010.
- I. Colorado River Salinity Standards, Regulation No. 39, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective August 30, 1997.
- J. Section 303(d) List of Water Quality Limited Segments Requiring TMDLs, Regulation No 93, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective April 30, 2012.
- K. Antidegradation Significance Determination for New or Increased Water Quality Impacts, Procedural Guidance, Colorado Department of Public Health and Environment, Water Quality Control Division, effective December 2001.
- L. Memorandum Re: First Update to (Antidegradation) Guidance Version 1.0, Colorado Department of Public Health and Environment, Water Quality Control Division, effective April 23, 2002.
- M. Determination of the Requirement to Include Water Quality Standards-Based Limits in CDPS Permits Based on Reasonable Potential, Colorado Department of Public Health and Environment, Water Quality Control Division, effective December 2002.
- N. The Colorado Mixing Zone Implementation Guidance, Colorado Department of Public Health and Environment, Water Quality Control Division, effective April 2002.
- O. Baseline Monitoring Frequency, Sample Type, and Reduced Monitoring Frequency Policy for Domestic and Industrial Wastewater Treatment Facilities, Water Quality Control Division Policy WQP-20, May 1, 2007.
- P. Implementing Narrative Standards in Discharge Permits for the Protection of Irrigated Crops, Water Quality Control Division Policy WQP-24, March 10, 2008.
- Q. Implementing Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (WET) Testing, Colorado Department of Public Health and Environment, Water Quality Control Division Policy Permits-1, September 30, 2010.
- R. Policy for Conducting Assessments for Implementation of Temperature Standards in Discharge Permits, Colorado Department of Public Health and Environment, Water Quality Control Division, Policy Number WQP-23, effective July 3, 2008.
- S. Policy for Permit Compliance Schedules, Colorado Department Public Health and Environment, Water Quality Control Division Policy Number WQP-30, effective December 2, 2010.
- T. Procedural Regulations for Site Applications for Domestic Wastewater Treatment Works, Regulation No. 22, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective September 30, 2009.
- U. Regulation Controlling discharges to Storm Sewers, Regulation No. 65, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective May 30, 2008.

- V. Water and Wastewater Facility Operator Certification Requirements, Regulation No. 100, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective September 30, 2007.

Kenan Diker
October 30, 2012

VIII. PUBLIC NOTICE COMMENTS

The public notice period was from December 13, 2012 to January 14, 2013. No comments were received during the public notice.

Kenan Diker
January 15, 2013